

3

Law Offices of:
Philip J. Berg, Esquire
555 Andorra Glen Court, Suite 12
Lafayette Hill, PA 19444-2531
Identification No. 09867.
(610) 825-3134

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT,
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al,

Plaintiffs

vs.

ORLY TAITZ, et al,

FILED
Case No.: 09-cv-01898-ECR
MAY 28 2009
MICHAEL E. KUNZ, Clerk
Dep. Clerk

STIPULATED DISMISSAL WITHOUT PREJUDICE

OF DEFENDANT YOSEF TAITZ

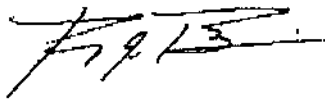
AND NOW, Plaintiffs, Lisa Liberi, Philip J. Berg, Esquire, Law Offices of Philip J. Berg, Evelyn Adams, Lisa Ostella and Go Excel Global and Defendant, Yosef Taitz, through their undersigned counsel hereby stipulate and agree as follows:

1. All claims against Defendant Yosef Taitz are hereby Dismissed without Prejudice.
2. Plaintiffs may apply to the Court for leave to join Defendant Yosef Taitz in this action upon satisfaction of all applicable joinder rules and leave of Court. Leave shall be granted only upon the Court's finding that Plaintiffs have established

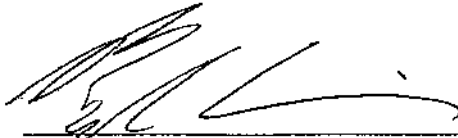
evidence sufficient to support a cognizable claim against Defendant Yosef Taitz arising out of the allegations in the Complaint filed May 4, 2009. No application for leave to join Defendant Yosef Taitz shall be made later than sixty [60] days before the close of discovery.

3. In the event the Court grants leave to join Defendant Yosef Taitz in this action, Yosef Taitz shall be permitted to assert all defenses available to him as of the date of this stipulation, including but not limited to defenses based upon failure to state a claim and expiration of any applicable statute of limitations.
4. Defendant Yosef Taitz shall be deposed and produce documents in this action as a non-party witness.
5. Counsel for Defendant Yosef Taitz shall continue to be included on the Court's docket for purposes of receiving all filings, and shall be permitted to participate in all discovery proceedings.

IT IS AGREED AND STIPULATED:

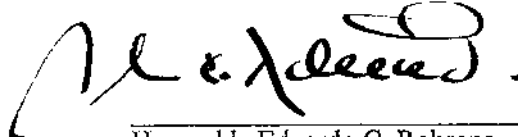


PHILIP J. BERG, ESQUIRE
555 Andorra Glen Court, Suite 12
Lafayette Hill, PA 19444-2531
Attorney for the Plaintiffs'



BRAD S. MILLER, ESQUIRE
COOPER MORRISON & ASSOC, LLC
325 Chestnut Street, Suite 403
Philadelphia, PA 19106
Attorney for Defendant, Yosef Taitz

IT IS SO ORDERED:



Honorable Eduardo C. Robreno
United States District Judge